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6 Attorney for Defendant
BACKGROUNDCHECKS.COM LLC

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 VALERIE MCKINNEY,

11 Plaintiff,

12 v.

13 EXPERIAN INFORMATION SOLUTIONS,
INC., TSC ACCOUNTS RECEIVABLE
14 SOLUTIONS and
BACKGROUNDCHECKS.COM LLC,

15 Defendants.

Case No. 2:22-cv-01354-GMN-VCF

**STIPULATION TO EXTEND TIME FOR
DEFENDANT
BACKGROUNDCHECKS.COM LLC TO
FILE RESPONSIVE PLEADING TO
PLAINTIFF'S COMPLAINT**

[FIRST REQUEST]

17 Plaintiff VALERIE MCKINNEY ("Plaintiff") and Defendant
18 BACKGROUNDCHECKS.COM LLC ("Defendant"), by and through their undersigned counsel,
19 hereby agree and stipulate to extend the time for Defendant to file a response to the Complaint from
20 the current deadline of December 27, 2022, up to and including **January 26, 2023.**

21 The requested extension is necessary in light of the fact that Defendant's counsel was recently
22 retained. The additional time will allow defense counsel to conduct a complete investigation into the
23 allegations and to prepare a response to the Complaint.

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1 This is the first request for an extension of time to respond to the Complaint. This request is
2 made in good faith and not for the purpose of delay.

3
4 Dated: December 27, 2022

Dated: December 27, 2022

5 Respectfully submitted,

Respectfully submitted,

6
7 /s/ Michael Kind

8 MICHAEL KIND, ESQ.
KIND LAW

/s/ Diana G. Dickinson

DIANA G. DICKINSON, ESQ.
LITTLER MENDELSON, P.C.

9 GEORGE HAINES, ESQ.
10 GERARDO AVALOS, ESQ.
FREEDOM LAW FIRM, LLC

Attorney for Defendant
BACKGROUNDCHECKS.COM LLC

11 *Attorneys for Plaintiff*
VALERIE MCKINNEY

12
13 **IT IS SO ORDERED.**

14 Dated: 1-11-2023

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17 UNITED STATES MAGISTRATE JUDGE

18 4855-6693-9460.1 / 107811-1025